



---

**REPORT TO: PLANNING AND REGULATORY SERVICES COMMITTEE ON  
3 AUGUST 2021**

**SUBJECT: EMPLOYMENT LAND AUDIT 2021**

**BY: DEPUTE CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT AND  
FINANCE)**

**1. REASON FOR REPORT**

- 1.1 This report summarises the employment land supply in Moray and asks the Committee to agree the final version of the Moray Employment Land Audit 2021.
- 1.2 This report is submitted to Committee in terms of Section III (E) (2) of the Council's Scheme of Administration relating to the review and preparation of Local Development Plans.

**2. RECOMMENDATION**

**2.1 It is recommended that the Committee agree:-**

- (i) to note the employment land supply in Moray;**
- (ii) the responses set out in Section 4 of the report; and**
- (iii) to approve the finalised Moray Employment Land Audit 2021, as set out in Appendix 1 of the report.**

**3. BACKGROUND**

- 3.1 Scottish Planning Policy (SPP) requires that the supply of marketable employment sites be regularly reviewed. The aim is to ensure that there is a sufficient supply of land to meet current and anticipated market requirements. Planning Authorities are required by SPP to ensure that there is a range and choice of marketable sites and locations for businesses allocated in the Local Development Plan (LDP). The levels of effective/marketable employment land and take-up of land are National Headline Indicators returned annually in the Planning Performance Framework (PPF) to the Scottish Government.

3.2 The Moray LDP 2020 Main Issues Report, published in January 2018, identified 9 main land use issues to be addressed by the new LDP, including “providing a generous employment land supply”. This has been a long-standing issue and the MLDP 2020 provides a long term, strategic approach to the provision of employment land to meet demand ranging from small start-up units to much larger sites for inward investment.

3.3 The Moray Employment Land Audit has three key functions:-

- demonstrate the availability of a range and choice of marketable employment sites;
- provide an overview of the supply and availability of employment land across the Local Development Plan area; and
- provide an evidence base for the monitoring and review of policies and proposals within the LDP.

3.4 The audit includes four categories of land supply:-

**Established** – This includes all undeveloped land allocated for industrial/business/employment use in the adopted LDP or land that has a valid planning approval for these uses.

**Marketable/Effective** – Land that as well as meeting business requirements, has a secure planning status, can be serviced within 5 years and is accessible by walking, cycling and public transport as defined in SPP.

**Constrained** – Land that is not considered developable within 5 years due to issues such as planning difficulties, ownership issues, infrastructure provision and physical constraints.

**Immediately Available** – Land that has planning permission, is serviced and has no major constraints to immediate development.

3.5 A copy of the audit will be submitted to the Economic Growth, Housing and Environmental Sustainability Committee for their information due to their interest in industrial and commercial development.

#### 4. **CONSULTATION**

4.1 The draft audit was made available for consultation on the Council’s website and sent to internal and external consultees, with comments invited by 5 July 2021.

4.2 Comments were received from Highlands and Islands Enterprise, Springfield Real Estate Management Ltd and Moray Council Estates. These are summarised below, along with the Council’s proposed responses:-

	<b>Comment</b>	<b>Council Response</b>
Highlands and Islands Enterprise	Confirms updates for Enterprise Park Forres are correct.	Noted

	Notes good uptake at Elgin Business Park and anticipates movement at Enterprise Park over the next year.	
Springfield Real Estate Management Ltd (SREM Ltd)	Change reference to Barmuckity to Elgin Business Park to avoid confusion.  Notes continued uptake and interest in remaining plots and starter units.	The I7 designation is still called Barmuckity within the LDP. However, the Audit has been updated to refer to "I7 Elgin Business Park, Barmuckity" to avoid any confusion. We will look to update the designation name in the next LDP.
Moray Council Estates	Raises concern about the supply of land in Forres. Notes initial investigations for I4 Easter Newforres have indicated very high infrastructure costs. The site is not viable without public sector funding support and is unlikely to come forward in the short term (5 years).	I4 Easter Newforres has been moved to the constrained supply. This highlights a significant shortage of general industrial land in the Forres Market Area

## 5. **AUDIT FINDINGS**

- 5.1 The 2021 Audit is provided in full as **APPENDIX 1** to the report. The audit identifies that there is 224.9 hectares (ha) of Established Employment Land Supply. This is an increase of 6.7ha compared to 2020 due to the inclusion of sites at Ashgrove and at Pinefield adjacent to Hendry Hydraulics. There has also been a recalculation of some sites where measurement errors were identified or there is now better knowledge of the site servicing requirements/constraints. The main supply of employment land continues to be within the Elgin, Forres and Buckie Market Areas, with a more limited supply in Keith and a very limited supply in Speyside. A summary for each Market Area can be found on page 5 of the Audit.
- 5.2 101.68ha (net) of land, across 21 sites, is classed as Marketable/Effective. This is decrease of 25.37 ha and 2 sites compared to 2020. The decrease is due to construction activity at I7 Elgin Business Park/Barmuckity, I6 Linkwood East, I2 Chanorry at Elgin; the construction of a new road at BP1 Forres Enterprise Park, and occupation of a site at I2 Waterford Forres; and in Keith construction on I3 Westerton Road East and occupation of sites at I2 Westerton Road South. There is also more market detail now available on

proposed plots at Elgin Business Park/Barmuckity to more accurately measure the available land. However, 17.75ha of land at I4 Easter Newforres has moved to the constrained supply due to initial investigations suggesting high infrastructure costs. The distribution of Marketable/Effective sites reflects the settlement hierarchy within the MLDP, however there continues to be a shortage of Effective sites within Speyside.

- 5.3 The Marketable/Effective supply is split with 64.86ha suitable for general industrial and 36.82 ha suitable for proposals that require a higher amenity setting usually within the class 4 Business category. The Elgin and Buckie market areas have relatively healthy supplies of general industrial land providing at least the equivalent of 15 years supply. In Keith the general industrial supply is more limited however there is a LONG allocation that could be drawn down if there is shortage. There has historically been a significant shortage of general industrial land in Speyside. This means there is a reliance on windfall proposals to accommodate demand. In Forres there is a significant shortage of general industrial land with only 2.75ha of land available at BP1 Forres Enterprise Park. This shortage of general industrial land requires to be urgently addressed. The Economic Recovery Plan includes actions to progress employment sites and industrial units in Forres and Speyside. In the longer term investment is required to maintain a supply of effective supply in these areas.
- 5.4 The amount of land Immediately Available is 35.34 ha (net), across 5 sites. This is a decrease of 2.11 ha since 2021. The decrease is due to construction activity at I7 Elgin Business Park/Barmuckity, I6 Linkwood East, I2 Chanonry at Elgin; and the construction of a new road at BP1 Forres Enterprise Park. There continues to be a restricted choice of sites in the Immediately Available Land Supply. This is a particular issue in Forres and Speyside. The availability of Immediately Available land is a Key Measure in the Moray Economic Strategy. The good progress on take up at I7 Elgin Business Park/Barmuckity suggest the Immediately Available supply in the Elgin Market Area will become very limited over the next few years. To maintain a supply of serviced sites it is necessary to work toward bringing other sites forward.
- 5.5 75.5ha (net) across 15 sites is classed as constrained. This means approximately a third of the Established Supply has some form of constraint that is likely to prevent the land being developed in the next five years. This is a decrease from 42% in 2020. This is due to unconstrained parts of LONG sites now being recorded separately. 48.06ha of land across 6 sites is classed as a LONG designation and would be capable of being bought forward should the need arise as set out within Policy DP3 Long Term Land Reserves within the MLDP 2020.
- 5.6 In the last year, 0.85ha of land was developed. This includes completion or occupation of sites at I7 Elgin Business Park/Barmuckity and I6 Linkwood East in Elgin; and I3 Benromach and I2 Waterford in Forres. This is an increase of 3.8ha compared to the 2020 Audit. Just over half of the land developed was at Benromach. However, it is noted the 2020 Audit relied on Development Management and Buildings Standards data as site visits were curtailed due to the Covid19 restrictions at the time so may not have been an accurate reflection of activity. 9.06ha of land is under construction, a small

increase compared to 8.22ha in 2020. The sites under construction include sites at I7 Elgin Business Park/Barmuckity, I6 Linkwood East, I2 Chanonry, OPP4 Ashgrove in Elgin, the road extension at BP1 Forres Enterprise Park, development in Keith at I3 Westerton Road East (including a small part of I11) and the initiation of development at Troves. These figures do not represent all building activity and only that on designated sites or windfall sites that are not restricted to a single user. In preparing the audit comments from Estates, HIE and other consultees suggest that despite the covid-19 pandemic and Brexit demand has held up relatively well, particularly for smaller units and serviced and small office spaces.

## **6. SUMMARY OF IMPLICATIONS**

### **(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))**

The Employment Land Audit is a key part of monitoring the implementation and effectiveness of the LDP, which delivers Corporate and Community Planning objectives. Ensuring sufficient provision of effective employment land supports a growing and diverse economy which will provide a stable, sustainable employment base.

### **(b) Policy and Legal**

The preparation of the annual Employment Land Audit is a requirement of SPP to monitor the effectiveness of the LDP and ensure an effective supply of employment land is maintained.

### **(c) Financial implications**

None.

### **(d) Risk Implications**

None.

### **(e) Staffing Implications**

Preparation of the annual Employment Land Audit is part of the workload of the Strategic Planning & Development section.

### **(f) Property**

The Employment Land Audit includes industrial estates and sites owned by the Council. The Council's Estates section were consulted on the draft audit.

### **(g) Equalities/Socio Economic Impact**

There are no equalities issues arising from this report as it is to inform the Committee on monitoring of land supply.

### **(h) Consultations**

Depute Chief Executive (Economy, Environment and Finance), the Head of Economic Growth and Development, the Legal Services Manager, the Estates Manager, the Equal Opportunities Officer, Paul Connor (Principal Accountant) and Lissa Rowan (Committee Services Officer)

have been consulted and are in agreement with the contents of the report/comments received have been incorporated into the report.

## **7. CONCLUSION**

- 7.1 SPP requires that the supply of marketable employment sites be regularly reviewed to ensure there is sufficient supply of land to meet current and anticipated market requirements. Levels of employment land and take up are National Headline Indicators submitted within the PPF.**
- 7.2 The Employment Land Audit 2021 identifies that there is 101.68ha (net) of Marketable/Effective Employment Land, of which 35.34ha (net) is Immediately Available. Issues are identified with the restricted choice of sites across all settlements, a shortage of land in the Speyside market area, a shortage of general industrial land at Forres, and the likely impacts of high take up at Elgin Business Park/Barmuckity (I7) on future supplies of Immediately Available Land.**
- 7.3 Committee is asked to note the employment land supply in Moray, agree the responses to the consultation (Section 4) and agree the final Employment Land Audit 2021 (Appendix 1).**

Author of Report: Rowena MacDougall, Planning Officer (Strategic Planning & Development)

Background Papers:

Ref: